

# EXHIBIT D

In violation of Title 18, United States Code, Section 2422(a).

USAO 2019R01099 / ES

**COUNT TWO**  
(Coercion and Enticement)

In or around October 2019, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

JOSE TORRES,

did knowingly persuade, induce, entice, and coerce an individual, namely Victim-2, to travel in foreign commerce, from Canada to the District of New Jersey, to engage in prostitution and in any sexual activity for which a person can be charged with a criminal offense; and attempted to do so.

In violation of Title 18, United States Code, Section 2422(a).

USAO 2019R01099 / ES

**COUNT THREE**  
(Coercion and Enticement)

In or around May 2018, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

JOSE TORRES,

did knowingly persuade, induce, entice, and coerce an individual, namely Victim-3, to travel in interstate commerce, from the State of New York to the District of New Jersey, to engage in prostitution and in any sexual activity for which a person can be charged with a criminal offense; and attempted to do so.

In violation of Title 18, United States Code, Section 2422(a).

USAO 2019R01099 / ES

**COUNT FOUR**  
(Coercion and Enticement)

In or around December 2015, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

JOSE TORRES,

did knowingly persuade, induce, entice, and coerce an individual, namely Victim-4, to travel in interstate commerce, from the State of Pennsylvania to the District of New Jersey, to engage in prostitution and in any sexual activity for which a person can be charged with a criminal offense; and attempted to do so.

In violation of Title 18, United States Code, Section 2422(a).

In violation of Title 18, United States Code, Section 2422(a).

USAO 2019R01099 / ES

**COUNT SIX**  
(Coercion and Enticement)

In or around November 2015, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

JOSE TORRES,

did knowingly persuade, induce, entice, and coerce an individual, namely Victim-6, to travel in interstate commerce, from the State of New York to the District of New Jersey, to engage in prostitution and in any sexual activity for which a person can be charged with a criminal offense; and attempted to do so.

In violation of Title 18, United States Code, Section 2422(a).

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FORFEITURE ALLEGATIONS

1. The allegations contained in Counts One, Two, Three, Four, Five, and Six of this Second Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2428.

2. Pursuant to Title 18, United States Code, Section 2428, upon conviction of an offense in violation of Title 18, United States Code, Section 2422, the defendant,

JOSE TORRES,

shall forfeit to the United States of America any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offenses and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offenses.

The United States will also seek a forfeiture money judgment against the defendant in the amount equal to the value of any property, real or personal, that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from these offenses, and the gross proceeds of these offenses, and any property traceable to such proceeds.

SUBSTITUTE ASSETS PROVISION

3. If any of the property described above, as a result of any act or omission of the defendant:
- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;

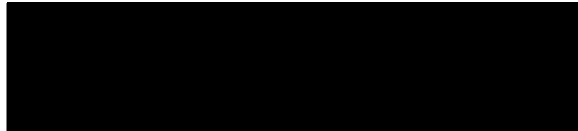


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- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL



FOREPERSON

  
CRAIG CARPENITO  
United States Attorney

CASE NUMBER: 20-418

United States District Court  
District of New Jersey

UNITED STATES OF AMERICA

v.

JOSE TORRES

SECOND SUPERSEDING  
INDICTMENT FOR  
18 U.S.C. § 2422(a)

A True Bill

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